



February 9, 2012

VIA FEDERAL EXPRESS

Mr. Joseph Karpa
New Jersey Department of Environmental Protection
P.O. Box 028
401 East State Street, 6th Floor
Trenton, New Jersey 08625-0028

**Re: Quarterly Progress Report – Fourth Quarter 2011
Standard Chlorine Chemical Company (SCCC) Site
Kearny, Hudson County, New Jersey
October 20, 1989 Administrative Consent Order**

Dear Mr. Karpa:

In accordance with Paragraph 49 of the Administrative Consent Order for the Standard Chlorine Chemical Company, Inc. (SCCC) Site located in Kearny, New Jersey and the Interim Response Action Workplan for the SCCC Site and Diamond Shamrock (Diamond) Site, please find enclosed three copies of the Fourth Quarter 2011 Progress Report.

If you have any questions regarding this report, please contact me at (412) 279-3363.

Sincerely,

Key Environmental, Inc.

James S. Zubrow, P.G.
Principal Hydrogeologist

cc: M. W. Kelly
E. Castro
M. Brouman
G. Coscia
S. Maybury
A. Hess
K. Staiger
M. Martello

QUARTERLY PROGRESS REPORT – FOURTH QUARTER 2011
STANDARD CHLORINE CHEMICAL COMPANY, INC. SITE
KEARNY, NEW JERSEY
ADMINISTRATIVE CONSENT ORDER EXECUTED ON OCTOBER 20, 1989

Activities Initiated or Continued During the Reporting Period

Interim Response Action Workplan (IRAW) construction activities that were initiated included:

- Installation of groundwater recovery pumps;
- Hydrostatic testing of South Ditch culvert system and culvert repair;
- Final grading and cover system placement for the Consolidation Areas (CAs);
- Piezometer installations adjacent to the slurry wall; and,
- Site restoration including wetland area restoration, mulching and partial grass seeding.

Non-IRAW construction activities that were initiated included:

- Hydraulic Control Treatment System (HCTS) shakedown and pre-startup activities;
- Installation of anode wells for corrosion protection of the steel sheet pile wall;
- Disposal of remaining response action construction residuals;
- Contractor equipment and material demobilization;
- Track 2 building demolition; and,
- Track 3 building demolition – contractor procurement.

Activities Completed During the Reporting Period

The IRAW construction activities were completed during this reporting period, including:

- Capillary break installation (with the exception of a portion of the non-IRAW former process area where Track 2 building demolition is ongoing);
- Installation of groundwater recovery pumps, well vaults and associated appurtenances;
- Construction of the HCTS including utility installation;
- Final operation, shutdown and decontamination of the Temporary Construction Treatment System (TCTS);
- Hydrostatic testing of South Ditch culvert system and culvert repair;
- Final grading and cover system placement for the CAs;
- In-place closure of the septic tanks including soil borings/confirmatory soil sampling and analyses;
- Piezometer installations adjacent to the slurry wall;
- Final closure/backfill of the former transformer pad area excavation;
- Stormwater management system construction; and,
- Site restoration including wetland area restoration, mulching and partial grass seeding (to be completed in 2012).

The non-IRAW activities that were completed included:

- Procurement activities for Track 2 building demolition;
- Installation of slurry wall crossings (concrete); and,
- Completion of the heated enclosure for the potable HCTS water meter.

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Correspondence/reporting documentation that was issued included:

- The New Jersey Department of Environmental Protection (NJDEP) submitted an approval letter dated October 3, 2011 with respect to the letter titled "Request for Modification to Waterfront Development Permit/Flood Hazard Permit/Water Quality Certificate" (August 26, 2011) pertaining to the addition of a proposed liner system for the Diamond Site CA stormwater management channel;
- The NJDEP submitted a letter dated October 3, 2011 approving the construction and Interim Remedial Action Report (IRAR) Schedule extension request (with respect to the letter request dated September 22, 2011);
- The Interim Response Action Report was submitted to the NJDEP on December 29, 2011;
- TCTS Discharge Monitoring Reports (DMRs) were submitted to the NJDEP; and,
- Bi-Weekly IRAW Construction Progress Reports were sent to the NJDEP.

Non-IRAW correspondence/reporting that was issued included:

- The HCTS Operator Form was submitted to the NJDEP on December 13, 2011.

Activities to be Initiated During the Upcoming Reporting Period (First Quarter 2012)

Activities to be initiated include:

- Site Operations and maintenance activities as defined in the Operations and Maintenance Plan;
- Startup of the HCTS;
- Submission of HCTS monthly DMRs;
- Track 3 building demolition field work; and,
- Submission of Track 2 building demolition Final Report to the NJDEP.

Activities to be Completed During the Upcoming Reporting Period (First Quarter 2012)

Activities to be completed include:

- Additional upland grass seeding;
- Installation of the steel sheet pile wall cathodic protection system;
- Disposal of remaining response action construction residuals and Contractor equipment and material demobilization; and,
- Placement of additional capillary break stone in the former process area.